RENOVATION CONSULTATION REPORT

CMHC SCHL

HOME TO CANADIANS

Canada

104-03112/

Public Consultation on Housing Renovation Programs

SUMMARY REPORT

December 2002

A. Introduction 1

B. Background 1

C. Renovation Programs 3

D. Residential Rehabilitation Assistance Program (RRAP) Off-Reserve 21

Homeowner RRAP 25

RRAP for Persons with Disabilities 29

Rental and Rooming House RRAP 34

Conversion RRAP 38

E. RRAP on Indian Reserves 42

F. Emergency Repair Program (ERP) 48

G. Home Adaptations for Seniors' Independence (HASI) 51

H. Shelter Enhancement Program (SEP) 55

A. INTRODUCTION

In the summer of 2002, Canada Mortgage and Housing Corporation (CMHC), in co-operation with the provinces and territories, undertook a public consultation on the future of the federal government's housing renovation programs. The consultation involved discussions with Canadians on their views on the effectiveness of the renovation programs and their ideas on how the programs could be improved.

This document provides a summary of the input we received from over 150 national, provincial, territorial and local stakeholder groups and individuals, including urban and rural municipalities and regional municipalities, First Nation provincial associations and Tribal and Band Councils, Métis and Innu groups, off-reserve Aboriginal associations, native inspection services, organizations representing non-profit and co-operative housing groups, seniors, transition homes, independent living centres, the homeless, persons with disabilities, occupational therapists, landlords, tenants, builders, and real estate agents, as well as advisory committees, housing partnerships, program beneficiaries, private citizens, agents responsible for the delivery of the renovation programs, and federal and provincial departments and agencies.

CMHC and the provinces and territories wish to thank the stakeholders who participated in the consultation process for the time and effort they made in providing their thoughts and ideas with respect to the renovation programs. The input provided has been carefully considered in work on possible options for the future of the programs. We also wish to thank the stakeholders for having demonstrated their interest and support for the renovation programs and providing their insights as to how the programs might be improved to better serve disadvantaged households in need.

B. BACKGROUND

The Residential Rehabilitation Assistance Program (RRAP) has been an integral part of housing policy in Canada since the early 1970s. RRAP provides financial assistance to ensure existing housing meets basic health and safety standards. In doing so, RRAP has helped to preserve and expand the supply of affordable housing, improve the quality of life in communities and create employment.

RRAP has been modified and expanded over the years to meet the repair needs of rental housing and rooming houses and to improve housing accessibility for persons with disabilities. As well, new programs such as the Emergency Repair Program (ERP), Home Adaptations for Seniors' Independence (HASI) and the Shelter Enhancement Program (SEP) have been added to complete a "RRAP family" of renovation programs. In Newfoundland, New Brunswick and Quebec, federal funding is used for certain provincial housing renovation programs with objectives compatible with the federal programs.

Over the years, these renovation programs have been increasingly focused on those in greatest need of assistance. Since 1986, RRAP, ERP and HASI have been targeted to households with incomes below the income thresholds used to determine eligibility for social housing. In 1999, as part of the Government of Canada's $753 million initiative to address homelessness, RRAP for the conversion of non-residential buildings to affordable housing was introduced, and SEP was expanded to include youth victimized by family violence.

RRAP funding for Indian Reserves has continued as part of the 1996 On-Reserve Housing policy. In recognition of the significant housing repair needs on Reserves, a total of $7.5 million is provided annually in addition to Department of Indian Affairs and Northern Development (DIAND) housing funding. CMHC RRAP funding for Reserves was increased by $7 million per year for four years as part of the initiative on homelessness.

A five-year, $250 million extension of the renovation programs was announced in 1998, and a further $311 million for the programs including SEP was announced over four years as part of the homelessness initiative in 1999. This funding is scheduled to expire at the end of March 2003.

Along with the public consultation process, CMHC has also conducted an evaluation of RRAP to determine if the program has been effective in achieving its stated objectives. The combined results of the program evaluation and the public consultation are providing a basis for discussions on the future of the RRAP family of programs beyond March 2003.

Consultation Results

C. GENERAL QUESTIONS ABOUT RENOVATION PROGRAMS

C1. Need for Housing Renovation Assistance

a) Is there a continuing need for government housing renovation and modification assistance? b) What are the main factors that will influence needs in the future?

a) All respondents said that there is a strong continuing need for government housing renovation and modification assistance. One mentioned that the need for a national housing renovation program cannot be overstated. Another commented that the renovation programs represented sound, compassionate public policy. A number argued that not only was there a need for the program to continue, but that it should be made permanent.

b) A wide variety of factors were noted with respect to future needs for government assistance.

Housing stock preservation was a critical factor. A great many respondents noted that the housing stock was aging and even deteriorating. Renovation and repairs were becoming more critical in order to preserve the built stock, both rental and home ownership. Renovation needs were growing, in part because of poor initial construction, a lack of proper maintenance, or premature exterior building envelope failure, but also because of higher building standards and the need to incorporate new technologies in the existing stock.

The preservation of the existing housing stock was seen as contributing to the optimum use of the overall housing stock to meet the needs of Canadian households. Renovation was perceived as more desirable than large-scale urban renewal, and was a critical tool in urban redevelopment and an important contributor to community development. Government renovation programs could help prevent urban decay and lead to neighbourhood renewal. Renovation was also seen as an important means to address quality issues in rural areas and small towns. It was also considered more environmentally friendly to repair the existing stock, rather than build new.

Renovation would also help maintain housing that was affordable to low and moderate income households. Renovation could help preserve or create housing in urban areas that was affordable to lower income senior households and would preserve housing that was affordable to younger households just entering the housing market. Maintaining existing housing that was affordable was important given the overall lack of affordable rental and home ownership housing, the low levels of new affordable rental supply and the absence of new social housing.

The renovation programs were also seen as a response to market failure. It was argued that the housing market undervalued structural and non-cosmetic repairs and that other factors, such as the tax structure and rent controls, made it more difficult for landlords to invest in renovation.

Renovation programs were also seen as a means of achieving greater energy efficiency and resource use within the existing housing stock. They were also perceived to be important employment generators and a means of restraining the black market in home renovations.

Low income was seen as another critical factor. There were a significant number of households with incomes too low to maintain and repair their homes and whose incomes were not keeping up with inflation or with rising housing repair costs. This could be seen in the large number of households in core housing need and the high number of those who were homeless or at risk of homelessness. Respondents felt that there was an increasing number of households on fixed incomes, such as senior citizens, persons with disabilities and single-parent families. Factors contributing to low income included high unemployment rates and inadequate social assistance levels. On fixed or low incomes, these individuals and households were not able to maintain their homes, especially given rising housing and repair costs, which placed their health and safety at risk and led to a deteriorating housing stock.

One factor cited most frequently was the aging of the population. Respondents felt that there would be ever increasing needs to adapt the existing stock to allow aging in place. The aging of the population was also linked to an increasing number of persons with disabilities, either elderly or not. Hence, there was a significant and growing population of individuals whose housing needs would change over time. Renovation and modification would allow housing to continue to meet the needs of those affected over time. Against these factors, respondents stated that aging in place and living independently were more cost-effective than long-term care arrangements, and were all the more necessary given the reductions in government long-term care funding.

Renovation and modification programs were also seen to be critical in the on-reserve situation, where the overall number of units was inadequate, the existing stock was under pressure due to overcrowding, the housing shortfall would widen because of population growth in First Nation communities and the existing stock presented significant health and safety problems, including the presence of mold. It was also noted that off-reserve Aboriginal households faced similar problems: population growth, an increasing number of young families with children on low incomes and living in substandard housing, often beyond the limits of current program criteria.

C2. Array of Programs

a) Are there needy clients or needs which are not being served by the current array of programs? b) Should the programs be expanded to include these groups/needs? What would be the rationale?

Responses to this question were split, with roughly two-thirds of respondents stating that the current array of programs did not meet all needy clients or needs, with the remaining one-third saying that they did. Perhaps the responses were summed up by one participant who said that there was already quite an extensive array of programs but more needed to be done. One respondent, but clearly an outlier in the consultation process, suggested that there were too many renovation programs, which did not allow for enough concentration of resources on any one problem.

Of interest is that responses were by no means limited to clients or needs not currently being served. Responses did address this issue, but also looked at possible changes to program design or parameters to better serve existing clients, greater flexibility in program delivery to better take into account local economic or housing circumstances and better respond to a client's real needs, and the apparent lack of funding to meet the current demand from households and individuals who could take advantage of existing programs. Also, a few respondents used the question as a means of expressing concerns about government funded housing programs in general, not just renovation programs.

There was a broad range of client groups suggested by the consultation process. Most ideas were raised by one or two respondents. The most frequent suggestions related mainly to current program design: many low-income households and individuals with incomes below the income thresholds were not being served because they did not have the financial means to afford the repayable loan; the income thresholds were deemed to be too low as they excluded the working poor, seniors on pensions or couples on minimum wage or incomes; with respect to assistance for persons with disabilities, the income thresholds were considered too low and adjustments were needed to the definition of income, to account for living expenses associated with the disability.

Another issue raised by a number of respondents concerned the publicly assisted stock, in particular social housing without adequate replacement reserves. Respondents felt that this stock should be eligible for renovation assistance, either now or after the operating agreements expired, in order to preserve the stock and to make it more accessible to occupants with disabilities. Other ideas raised more than once included permitting the creation of secondary suites in existing residential units and financing to address air quality and energy efficiency concerns.

Other program criteria deemed to be impediments to serving clients included the 'all or nothing' approach to meeting minimum standards under RRAP, and house value thresholds that excluded some needy households. One respondent suggested that the income targeting under Rental RRAP was too restrictive and that a measure of income-mixing should be allowed, as an incentive for landlords to renovate their buildings. It was also mentioned that the assistance levels were too low to allow for the complete rehabilitation of some dwellings, which was felt to be necessary in situations where no other housing was available.

There was a wide range of potential client groups or potential renovation activities raised by respondents. Among potential clients were women and children, including the invisible homeless; underemployed or unemployed youth or young people with significant student loans to repay; and, an expansion of the types of disabilities being addressed by the programs, including the mentally ill and households with severely disabled children with incomes above the income limits; and, elderly people needing to be discharged from hospital. There was also a proposal to lower the HASI age eligibility to 55.

Respondents also raised a significant number of issues with respect to the type of housing being renovated or housing types not being adequately served at present. Besides those discussed above, suggestions raised included renovation assistance for residential group homes for special needs clients, often in older buildings; buildings suffering from premature building envelope failure; the extension of RRAP for Persons with Disabilities and HASI to create more supportive housing for seniors; the conversion of large single-family homes into multi-tenant buildings; a greater focus on inner-city stock, an area current programs appeared to overlook; greater incentives for landlords to renovate; the need for an emergency repair program in urban centres; the creation of new barrier-free housing, as opposed to the focus on modifying existing units; youth shelters for youth under the age of 16; and long-term housing for victims of family violence. Also, there was a suggestion that the renovation programs be linked more closely to community development programs. Finally, some respondents wished the federal government to create new affordable housing, as well as renovating the existing stock.

C3. Program Demand

a) Are you aware of waiting lists for renovation programs in your area? If yes, which program components? b) What criteria should be used to determine who is served first?

a) Well over two-thirds of respondents said that there were waiting lists for the program. Not all respondents indicated which program components were or were most affected by waiting lists. Those that did mentioned almost all programs, with perhaps Homeowner and On-Reserve RRAP being cited most frequently. One respondent noted that the waiting list would be even greater if the programs were better known or publicized.

b) With respect to criteria to prioritize needs, those most often cited were severity of renovation need and risk to health and safety (ie, 'worst-first'), emergency situations, depth of financial need, the presence of persons with disabilities, and, also, the length of time on a waiting list, which does not in all cases mean 'first come, first served'.

Other criteria that were proposed less frequently by participants included overcrowding, the age of the housing to be renovated and the concept of geographic targeting to meet local needs and preserve neighbourhoods.

Finally, a number of respondents stated that waiting lists were a function of a lack of program funding. In these cases, it was felt that all needs should be treated as priorities and with proper funding levels there would be no need to prioritize.

C4. Targeting Program Assistance

a) Should renovation program assistance continue to be targeted, and if so, b) what should be the means to ensure effective targeting?

a) There was almost unanimous consent that the renovation programs should continue to be targeted to need. This reflects a desire to help the needy and the realization that funding will necessarily be limited. Even in the very few cases where it was indicated that targeting was not required, the respondent wished to raise a specific issue not addressed by the current array of programs and targeting criteria.

b) By a large margin, the targeting means cited the most often was income, usually with reference to existing income thresholds. However, in this respect there were a number of varying points of view. First, there were respondents who agreed with the current approach based on the current income thresholds. Secondly, there was a group of respondents who suggested targeting based on criteria even stricter than the current thresholds; for example, targeting first households or individuals in greatest financial need or those on social assistance or disadvantaged groups such as the elderly, Aboriginal households or persons with disabilities. On the other hand, a third group agreed with targeting to need based on income, but suggested that the current thresholds should be relaxed, to reflect expenses for clients with disabilities, or currently excluded groups such as seniors, the working poor, and couples. There was also the suggestion that the thresholds should be higher in urban areas experiencing higher renovation costs. One respondent agreed with targeting, but argued that there should still be some form of renovation assistance for middle income households. In addition, a number of respondents referred to targeting based on low income and financial need without specifically referring to current income limits.

Also, there was a stated desire to target to persons with disabilities and to First Nations.

Other targeting criteria, mentioned less frequently, were the aging housing stock, the level of disrepair or health and safety concerns, and geographic targeting, in particular for neighbourhood improvement. One participant suggested targeting to those creating new units, either through building or conversion. There was a mixed reaction to rental housing. Some participants suggested that targeting be based on rents charged, whereas one or two suggested that rental housing be given a lower priority, or be excluded entirely, on the grounds that landlords were able to pay for renovation costs out of rents charged. One participant suggested that priority for social housing providers should be based on project viability, if the programs were extended to include these projects. Another stated that priority should be given to projects experiencing premature exterior envelope failure.

There was also a suggestion that program resources should be block funded to provinces and territories, to allow for greater flexibility in moving resources across programs.

Finally, a few respondents suggested that the National Building Code be amended to make all new housing accessible or visitable, to avoid the need for expensive renovations later and hence reduce the overall demand for renovation assistance over time.

C5. Income Limits

How should income limits for renovation programs be determined? Why?

With respect to income limits or eligibility criteria, the existing approach based on household income thresholds clearly gained a wide degree of support, on the grounds that they were fair and worked well.

Nevertheless, in addition to those which supported the current approach, there were others who suggested that while retaining the concept of income limits changes were required. Changes fell into a few broad categories. First, a number of respondents suggested that the current income limit be raised, specifically to address the issue of elderly households or the working poor whose incomes were just above the current levels but clearly should be considered in need. Other suggestions for raising the current levels included indexing them to cost of living increases or to reflect the true costs of 'alternative' accommodation in given market areas. It was noted that the income thresholds had not been updated for many years. One respondent felt that a higher income level be applied to homeowners as opposed to renter households. Along the same lines of generally increasing the thresholds to make them more reflective of actual household or market conditions, others felt that the current housing limits should be replaced by income cut-offs used elsewhere, such as the minimum wage or those in effect under the National Child Tax Benefit, or even Statistics Canada's low income cut-offs (LICOs).

Another group that generally supported the present approach to income limits suggested that the income criterion needed to be balanced by some sense of housing expenses, given that households with a given income did not necessarily have the same disposal income, and income alone was not an adequate criterion to establish program eligibility. Participants suggested that account should be taken of the greater costs incurred by households with children, medical or drug expenses or costs associated with a given disability, higher transportation costs incurred by people living in far northern and remote areas, or even the actual costs of operating and maintaining a dwelling. Along the same lines, a number of participants suggested that income be based on the income of the homeowner or those on title, as opposed to the total household income, as some of the household income was likely not permanent or available over an extended period of time. In particular, it was suggested that household income not apply in the case of women and children who were victims of family violence. Interestingly, one participant argued that there should be only one national income limit, as opposed to a system of geographic variants, to eliminate preferential treatment to given areas and achieve consistency with other national programs, such as CPP. It was also suggested that an advisory group of seniors and low-income people should help develop the income criteria.

Few participants suggested eligibility criteria, such as housing condition, that were not linked to income. Those that raised such considerations as the age of the applicant, remote access and the number of dependents, usually did so to fine-tune eligibility and priority setting criteria based mainly on income.

A very limited number of respondents argued for no income limits, usually for specific programs or areas, such as ERP or RRAP for persons with disabilities, or in core urban areas. With respect to RRAP for Persons with Disabilities, it was argued that the program objective was to allow the client to remain in their home and accessibility modifications did not increase the house value. For Rental RRAP, it was suggested that eligibility be based on rent levels only, as it was difficult to assess tenants' incomes. One participant suggested that there be no income limits, and that the program be made universal, with benefit levels based on a household budget approach.

Answers to this question also touched on the issue of program benefits, as opposed to a strict consideration of eligibility. Most frequently, comments were related to the level of benefit provided to low-income households that did qualify. In this regard, it was suggested that the repayable loans be adjusted to better reflect ability to pay.

C6. Alternatives to Direct Public Funding

How could governments enable more homeowners and landlords to access funding for housing repairs and improvements without direct public financing?

Participants provided a wide range of suggestions with respect to alternatives to direct public financing for renovation work. Support for various ideas was relatively even, with low-interest financing and government loan guarantees being mentioned more often than others.

A number of ideas were related to lending and loan financing. Some participants suggested that interest-free or low-interest loans be provided by either governments or the private sector. Others proposed that the government provide a loan guarantee or act as co-signer on renovation loans; one participant suggested that guarantees on lending to landlords should be linked to control of rents. Other participants proposed that the CMHC second mortgage loan insurance program be expanded, with lower fees, to support more renovation activity. Other ideas included providing longer amortization periods for renovation loans, allowing renovation costs to be included in existing CMHC mortgages, or structuring renovation loans much like student loans, administered by the private sector, with repayments based on ability to pay. It was also suggested that resources be block funded by the government to municipalities, which could then set up a revolving fund to provide low-interest loans to landlords and homeowners.

A second set of ideas related to various tax measures. These included income tax deductions, tax breaks on materials and labour, GST exemptions for repair and maintenance work, tax-deferred savings plans or a tax incentive program for renovation work, income tax free withdrawals from RRSPs, and municipal tax incentives. With respect to the latter, one proposal was that municipalities provide a tax break for a number of years equal to the tax increase due to renovation work.

There was a number of suggestions related to models of community involvement or self-help. These included applying the co-operative housing model to renovation activity, volunteerism such as Habitat for Humanity, encouraging third party benevolent financing or involving community groups in renovation work for the needy. In keeping with the theme of self-help, there were a number of participants who suggested that the public be provided more education on alternative financing options such as remortgaging or reverse mortgages, or more education on the benefits of proper home maintenance and how to repair one's own home. It was felt that such education would bring more households to maintain their homes properly, leading to lower downstream repair costs.

Finally, there were a number of participants, even among those who offered alternative ideas, who stressed the fact that for low-income households and individuals there was no real alternative to direct public financing, as it was governments' responsibility to respond to housing needs.

C7. Overall Adequacy of Program Funding

a) What do you believe would be an appropriate level of annual funding for the programs, and b) why do you think this would be justified?

a) With respect to program funding levels, a majority of respondents felt that the budgets needed to be increased. Most did not provide a specific funding level but simply stated that there should be an increase. At times, this was phrased as providing a budget level based on existing waiting lists or that met demand. A number of participants suggested that the budget be doubled. A few respondents argued that there was a need for a 'dramatic' increase in funding to some $400-$500 million per year, with one participant arguing this for rental housing alone, to offset the potential loss of some 20,000 rental units a year. Along the same lines, another participant argued that there should be a significant budget set aside to address the upwards of $80 million repair needs caused by premature building envelope failure. Included with a number of these suggestions was the idea that the new budget level be indexed to inflation.

Requests for budget increases were made for all program components, including Homeowner RRAP, Rental and Rooming House RRAP, On-Reserve RRAP, and RRAP for Persons with Disabilities. A smaller group of participants felt that the current budget level, as set by the 1998 and 1999 funding decisions was adequate, but needed to be indexed to inflation. One participant said that the funding decisions had been a great help.

A few participants argued that program funding be made permanent. One participant argued that funding would have to remain at current levels for another 10 years to address existing needs.

Another group of respondents felt that the budget level should be based on an analysis of renovation need and a specific government target as to the time to be taken to address the need. In this regard, one participant argued that there was a definate need to undertake a serious repair need survey in order to establish the actual renovation need across the country.

Finally, there was a much smaller group of participants who felt they did not have sufficient information to address this question.

b) Reasons given for program funding were obviously similar to those provided in C1. The reason most cited was the existence of long waiting lists. In this respect, it was noted that households usually applied for renovation assistance when their unit was in a state of disrepair, which meant that help ought to be provided quite quickly. Other reasons provided included significant needs in First Nation communities, the considerable achievements made possible by additional funding from the federal government's homelessness initiative, high levels of rental need, increasing renovation costs which low-income households could not afford, the large number of homeless individuals, cut backs to social assistance programs which exacerbated the situation of low-income families, the need to provide greater support to persons with disabilities, and the fact that the renovation programs were among the few housing programs left and they allowed the federal government to exercise leadership.

C8. Allocations by Renovation Program Component

a) How should funding for the renovation programs be allocated to individual off-reserve program components? b) What is the rationale for your suggestion?

This question occasioned a wide range of responses. A distinct minority of respondents felt that the current allocation by program component was appropriate, with most of these arguing that overall budget levels needed to be increased.

Some respondents felt that the allocation by program should be based on need and then adjusted based on take-up and achievement, with funds flowing from programs that were undersubscribed to those that were oversubscribed and having to deal with waiting lists. One group that proposed this general approach was unable to reach a consensus as to how to determine need. Another proposal along somewhat different lines was that the allocation should be based on waiting lists.

There were arguments for increasing allocations to a number of programs. RRAP for Persons with Disabilities and HASI were perhaps mentioned more often than other programs. The reasons given for a shift in resources to these components included an aging population and an increasing number of persons with disabilities requiring modifications to remain in their homes. Funds spent here would promote independence. Some participants that made this suggested also felt that the budget should come from the Homeowner RRAP budget. There was also support for a higher budget for SEP, given the special needs of the target groups and the fact that a higher budget level would attract more stable partnerships. A number of respondents also suggested increasing the ERP and Conversion RRAP budgets.

The reaction to Rental and Rooming House RRAP was more mixed. There were some who saw the need to increase this budget given repair needs in this stock or the low incomes of the tenant population. There was a suggestion to base the allocation on vacancy rates and the percentage of tenant households with severe affordability problems. On the other hand, some argued that the rental and rooming house allocation should be decreased. Reasons for this included the fact that landlords were felt to have in general higher incomes and should be able to pay for renovation costs, and, a very different approach, the idea that the rental allocation was too small to have any impact and hence the funds should be shifted where they would be more effective.

There were also a few suggestions to decrease the Homeowner RRAP budget. Reasons given included the argument that homeowners were able to borrow against the value of their home and that the program, with its all or nothing approach to renovation was an impediment to take-up under RRAP for Persons with Disabilities.

There were a few suggestions that funds be allocated to allow for the repair and renovation of social housing projects in disrepair, in order to preserve the social housing stock. Within this context, one participant argued that a specific allocation be made to address the issue of premature building envelope failure in social housing projects, even suggesting that funds be diverted from all other programs until this issue was resolved.

A number of participants suggested that all off-reserve renovation programs be combined into one and the available budget be blockfunded to the local level, based on some assessment of need. Along the lines of the community approach under SCPI, the local level would then determine priorities and allocations based on local requirements and distribute resources accordingly.

C9. Allocations by Jurisdiction

a) Is this basis for the allocation of funding appropriate? b) If not, what should it be and why?

a) Opinion on this question was divided relatively equally between those who found the current allocations reasonable and those that did not. A smaller group of participants did not comment, usually because they felt that they did not have sufficient knowledge to provide an informed opinion.

b) With respect to those respondents who did not agree with the current allocation, there was a wide range of suggestions offered as to factors upon which an allocation formula could be based. Ideas included taking into account factors like internal migration rates, such as from the rest of Canada to British Columbia; unemployment rates, on the grounds that employed households could better meet their renovation and repair needs; a recognition of higher costs in northern areas that an allocation based on population and core need did not recognize; the age of the housing stock; the rate of the elderly among the population by jurisdiction; the presence of premature building envelope failure; and child poverty rates.

Most often mentioned was an allocation based on housing need, either alone or in combination with other factors. In this regard, there was one suggestion that the sole criterion should be the CNIT housing adequacy criteria, to ensure the allocation reflected need. Another participant argued for a proper renovation need survey, as the CNIT data could not be considered accurate and up-to-date.

C10. Administration of Renovation Programs

How could the administration of the renovation programs be improved? Please indicate if your comments relate to certain renovation programs or all of them.

Many suggestions were provided with respect to possible improvements to the delivery and administration of the programs. A sense of the degree of support for these ideas can be seen in the number of times each was mentioned in responses. In addition, there was a fairly significant number of participants who stated that the current process worked fine and shouldn't be changed, but they were a minority as compared to the number of participants suggesting improvements.

Proposals covered a wide range of issues. For example, a number dealt with delivery agents: more delivery agency staff were needed to ensure quick turnaround times on applications; there was a need for more face-to-face communications between the delivery agent and the client; delivery agency staff needed to be better trained with respect to the needs of clients, such as persons with disabilities, and needed to be better aware of the impact delivery delays might have on the health and safety of clients; also, agents should be trained and monitored to ensure quality control of work being done; one respondent suggested that delivery agent qualifications could only be met by hiring qualified professionals as agents; delivery agents should be able to approve the application directly, with the approval letter coming from the municipality, which would be responsible for overall delivery; and delivery agents should develop partnerships with regional or municipal government staff.

The delivery agent issue most frequently raised concerned the delivery agent fee structure. It was suggested that this be raised to more properly reflect the amount of work necessary to deliver the program. Also, work involved in processing applications that are ultimately rejected should be reimbursed. In general, fees should ensure quality delivery of the programs. In this regard, concern was expressed that delivery agency work was basically contract work, with staff being hired for six months and then laid off.

There were a number of other suggestions dealing with program delivery. Quite a few participants suggested that the programs should be delivered directly by the municipalities, as they were seen as being closer to the community and having a more direct understanding of community renovation needs. Along these lines, another comment suggested this would preclude delivery agents serving a wide geographic area encompassing many municipalities. A related comment was block funding of program resources to the municipalities to provide for more program and delivery flexibility, and allow for better integration with other available programs. One participant suggested that CMHC bypass the provinces and deal directly with the municipalities. From a different perspective, one participant expressed concern about direct municipal involvement in program delivery, as a conflict of interest situation could arise in the case of projects a municipality was directly involved in; a more transparent process would be required to counter this. Still dealing with program delivery, there was a suggestion made that social agencies might be able to deliver portions of the programs, or at least be more involved in the client assessment process. One participant suggested a committee involved in housing issues in a municipality be included in the decision-making process.

A great many comments dealt with the delivery process itself. Many participants stated that the application process needed to be streamlined, by reducing paperwork and computerizing forms and processes. For example, the calculation sheet should be eliminated, with the loan based on income alone. One participant felt that one contractor quotation was sufficient, if it were within 10 per cent of the inspector's estimate. It was suggested that more inspectors be hired to shorten the inspection time. The conditional approval process was seen as slowing the process. Another idea was an increase in program flexibility as a means of reducing administrative complexity. To reduce the number of unsuccessful applications, it was suggested that more information be made available earlier in the delivery process.

There were also many comments about the program budgeting and advancing processes. Quite a few participants stated that the program budget should be made available earlier in the year, starting in March, rather than much later on, as was currently the case. Also, the desire was expressed to have yearly budgets available with more certainty from year to year, under a more formal budget arrangement. This was seen as a way to allow for greater staff continuity. Furthermore, there were suggestions to the effect that budgets should be provided upfront: for example, block funding the budget to municipalities or, on a per capita and needs basis, to First Nation communities to allow the Band or Tribal Council to administer its own program. On a related topic, there were a few comments suggesting greater coordination between the use of renovation funds and those available through other federal, provincial or municipal programs, including coordination of proposal calls, to achieve greater synergy and overall impact.

There were also a few comments with respect to advancing. For example, it was proposed repairs be funded upfront, or at least before the final inspection. Also, it was suggested that funds for building materials be provided upfront to First Nations to ease their financial burden. There was also the proposal that agents be permitted to advance funds to recipients or contractors, provided there was an adequate monitoring and auditing system in place.

Some proposals dealt with the management of the renovation process. One participant felt that some agencies, such as women's shelters, had the capacity to manage their own renovation program, under their responsible board, without the need for further oversight. Proceeding in this manner would reduce bureaucracy and save program funds. On the other hand, there was a suggestion that the program allow for a third party to manage the renovation process from start to finish, supervising the contractor throughout, as an assist to the client. It was noted that the current fee schedule did not allow for this. Along similar lines, one participant suggest that cheques be made payable to both the client and the contractor.

There were a few comments respecting contractors. There was a concern raised that there was difficulty finding contractors. One suggestion raised a number of times was the introduction of a list of prequalified contractors. One participant suggested that delivery agents should be able to advise clients as to suitable or unsuitable contractors. Also, a suggestion was made that municipalities should hire inspectors and contractors to do the work directly, in order to reduce program costs and improve efficiency.

Finally, there was a proposal to publicize the programs and one participant suggested that mentoring be provided to clients after the renovation work had been done.

C11. Other General Comments on Renovation Programs

Many respondents noted the importance of the renovation programs, as being a critical component of a national housing strategy, a complement to other local housing initiatives, a cost-effective means to address real needs, a support to public policy objectives including the disability agenda and aging in place. In particular, a great need was seen for Rental RRAP to improve the quality of rental units and help meet the looming crisis of an aging rental stock. Participants supported the renovation programs, wished to see them continue, with increased funding levels.

In addition, there were a number of suggestions for improvement to program delivery and administration including enhanced delivery agent qualifications, streamlined processes and paperwork, enhanced financial controls, more specific guidelines as to what is eligible, direct communication between the client and the contractor, greater use of professionals like occupational therapists in the assessment process and greater municipal delivery. A number of participants wanted program benefits to reflect actual renovation costs and not place such a burden on low-income households. There were also recommendations for more CMHC support for co-operative housing and supportive housing, more initiatives to assist low-income women access home ownership, a need to address mold and air quality issues on-reserve, and more consultation with women in poverty when developing housing policy.

D. QUESTIONS ABOUT RESIDENTIAL REHABILITATION ASSISTANCE PROGRAM (RRAP) OFF-RESERVE

The structure of the summary paper matches that of the consultation paper and hence there is no section D.1, as no questions were raised in the consultation paper at D.1.

D2 General Questions About RRAP

D2.1. Assistance Levels

a) Are RRAP assistance levels currently adequate to address program objectives related to basic standards, affordable housing and accessibility? b)If not, what should assistance levels be (please provide examples to support your case if possible)?

About two-thirds of respondents felt that current assistance levels were inadequate. The main points raised were to the effect that levels should be raised to reflect inflation since 1994 when they were introduced, or that they should reflect actual construction costs. A number of participants felt that the levels should be more closely tied to local construction costs and not to zones. Others felt that assistance levels should allow for the complete renovation of a home. There were also some recommendations to recognize higher assistance levels for specific areas or needs: a number noted that accessibility modifications were more expensive than health and safety repairs and hence assistance should be 10 to 25 per cent higher for RRAP for Persons with Disabilities; it was recommended that Conversion RRAP be increased to $25,000 in urban areas as a means of creating new, affordable rental units; there were also recommendations to recognize higher costs in rural and remote areas. There were a few comments on Rooming House RRAP: one submission felt that $12,000 per bed was too high; another felt that the benefit should be based on a room and not a bed, as landlords tended to maximize the number of beds in a room to gain more forgiveness. One participant felt that the real problem was the forgiveness scale, and not the maximum amounts under the program; another suggested that loan and forgiveness maxima were not the correct policy approach, as they tended to bunch repairs around the forgiveness maxima- it was suggested that benefit levels be based on ability to pay. There was also a call for a separate program component for affordable housing development, which would require much higher

limits than those available for renovation. Finally, a number of participants noted that higher benefit levels would only lead to longer waiting lists, unless there was a concomitant increase to program budgets.

D2.2. RRAP Zones

a) Do RRAP zones and related variations in program funding levels accurately reflect differences in costs and needs? b) If not, how should they be changed and why?

Responses were relatively evenly split on this issue. With respect to possible changes, a number of respondents recommended that higher costs in major urban areas should be recognized. Another recommended an increase of some 30 per cent in the northern remote category to reflect real costs. In this respect, there were suggestions that actual costs be recognized, regardless of zones; one respondent felt that the zones did not reflect regional differences and needs. Also, one participant suggested that there was no need for zones: the program should be based on a maximum loan to allow for renovations, beyond which a loan would be made available to demolish the dwelling and rebuild.

D2.3. Focus on Health and Safety Items as Eligible Repairs

a) Should RRAP continue to focus primarily on addressing health and safety issues? b) If not, what should be the other priorities? Why?

The great majority of respondents supported a continued focus on health and safety issues. Respondents still provided a lengthy list of possible additional eligible items. One participant noted that 'health' had a very wide connotation. Those most widely supported were energy conservation, as a means of both reducing dwelling operating costs and assisting overall conservation goals, improved ventilation, especially for mold remediation, personal safety items- this was mentioned most often with respect to the elderly and single mothers and victims of family violence-, and the addition of secondary suites to existing residential buildings. Other items included the inclusion of the existing social housing stock as eligible for program assistance, preservation of the existing housing stock, the need to do all for the preservation of original components in heritage buildings, the addition of elevators and sprinkler systems to rental projects, fire safety modifications in

rooming houses, general repairs and maintenance, soundproofing, 100 amp electrical service, site safety, such as retaining walls, livability in older stock (e.g., more storage space, common areas, main floor laundry rooms), the recognition of new technologies, premature building envelope failure, and protecting those at risk of homelessness.

Some participants called for more flexibility in the application of the all-or-nothing approach to renovation. One participant felt that the RRAP standards were too rigid. Another felt that the extension of useful life criterion should be relaxed from 15 years to 7 or 8. Another said that there needed to be some balance between the needs of the occupant and the needs of the structure.

D2.4. Awareness of RRAP

a) Is awareness of RRAP a problem, and if so, to which program components does this apply ? b) How could the availability of RRAP be better communicated to potential clients?

A large majority of respondents felt that there was a problem with program awareness. Almost all program components were mentioned.

There were many suggestions to improve awareness. A number of participants stated that increasing awareness ought to be accompanied by program budget increases, otherwise waiting lists and applicant frustration would increase. Others suggested that potential clients might be aware of the program but would be confused about program parameters, such as health and safety items, or the responsible delivery agent. One participant felt that the promotion that was being done was less likely to reach low-income households than others of higher income.

Suggestions for raising awareness included broad publicity campaigns, including public or community workshops and information sessions or press releases in the local media, including free newspapers, and more targeted mechanisms, such as educating community groups and health care professionals, approaching landlord groups directly, inserting pamphlets in property tax statements or old age security cheques, or working more closely with municipal inspectors to identify operators of rooming houses.

Other proposals included running the rental program throughout the year in their area rather than confining it to a single proposal call, administering the program locally, and using Aboriginal languages to better reach potential Aboriginal clients.

D2.5. Other comments on the Residential Rehabilitation Assistance Program.

A number of respondents stated that RRAP was an essential program for low-income households and those with disabilities, and it allowed people to remain in their homes and communities. One said that without RRAP there would be many more homeless persons.

This question elicited a number of suggestions for improvement. They include increasing the maximum assistance levels to cover the costs of what needed to be done and to help the lowest-income applicants, revising the sliding forgiveness scale, as full forgiveness at 60 per cent of the income threshold acted as a barrier to program access, in general, providing more program flexibility so that clients' needs could be truly addressed, higher budgets to meet waiting list demand, the ability to replace a unit beyond repair if the household had no alternative housing available, extending program eligibility to include the existing social housing stock, allowing home owners to do their own repairs, improved monitoring of operating agreements and tenant incomes under the rental component, allowing the conversion of rooming houses into self-contained units, providing financing earlier, and making payments in the contractor's name as well as the client's. Other ideas included more flexibility to reallocate budgets across programs and program components, and adding a length of residence criterion to the homeowner component, to prevent real estate agents from using RRAP to sell units in need of repairs.

D.3 Homeowner RRAP

D3.1. House Value Thresholds

a) Are House Value Thresholds (HVTs) a good way to ensure targeting of RRAP assistance? b) How could this be improved (please provide examples or information, if available, to support your case)?

The vast majority of respondents felt that the use House Value Thresholds was a good way to ensure targeting of assistance. Reasons cited included that older, lower value homes were in most need of repair; values were a valuable tool for targeting; and they worked against gentrification (although others felt the program kept low-income households in a declining area and prevented higher-income households from regenerating it). Another stated that household income did not always reflect the value in the home and the homeowner should borrow against this value before being eligible for renovation assistance. One respondent felt that RRAP should definitely not pay for luxury housing.

Others felt that a house value criterion did not recognize that the household could still have a low income and need assistance, especially in the case of persons with disabilities, or that even higher value homes might not meet health and safety standards, or that it should not be applied to buildings experiencing premature exterior envelope failure.

There were many suggestions for improvement. Some wanted higher thresholds, whereas another suggested that the thresholds were too high as in some communities they already represented expensive homes. Quite a number of respondents felt that the thresholds should reflect the actual housing market and hence should be monitored regularly. Another comment was to the effect that thresholds should reflect prices in a given municipality, which suggests a more nuanced as against a generalized approach to setting thresholds. Another participant suggested the thresholds be based on a distribution of house values, for example, the 90th percentile, in a given area.

Another matter mentioned several times was the issue of the value of the building or home versus the market value of the entire property. It was recommended that the threshold be based on the value of the building only, as market increases often reflected land price increases. A similar issue was raised with respect to farmers and it was suggested that in this case the value of the house with perhaps a preset land value be used.

Another issue was the question of how to balance house values with household incomes. One participant recommended that the house value be balanced by the length of residency. Another felt that the house value should be balanced by the number of people in the household, the size of the dwelling as well as household income. Still another saw the house value as one input, along with income and others, into a point system.

Other comments included the perceived need of minimum thresholds as well, as some houses were not worth preserving, including the value of vacation properties and second homes in calculating the overall value of an applicant's home, introducing program flexibility in the application of the threshold to deal with individual cases, and targeting the program exclusively to city areas most in need of renovation assistance.

D.3.2. Client Ability to Repay Loans

a) Do the current loan repayment requirements mean that some people are unable to participate in RRAP or afford to pay back the loans? b) What should be done to help those who cannot pay whatsoever, as well as those who could pay but cannot afford the full payment?

With only one or two exceptions, respondents agreed that current requirements excluded clients from participating in the program or left them with debts they could not repay. Basically, participants felt that clients were of low income and below the poverty line and were not able to take on additional debt.

With respect to improvement, suggestions included longer amortization periods, lower or no interest rates, recovery of the loan upon sale of the property, or writing off the loan if the client could not repay. Recommendations were also made to program parameters to address this problem: raising grant levels and indexing them to inflation, raising the repayable loan threshold (currently at 60 per cent of the income threshold) or eliminating it entirely so that assistance was fully forgivable, basing repayment on ability to pay, adjusting the calculation of household income or recognizing household expenses as deductions from income. One respondent felt that the forgivable loan was an administrative burden in the case of non-equity co-operative or social housing. Since, in this case, the residents were not about to sell their homes for a capital gain, then a grant should be provided to the housing association to cover the work.

Another group of participants recommended that the all-or-nothing approach to RRAP standards be adjusted, either by differentiating between critical and non-critical standards or leaving it to the client's discretion as to whether to incur a repayable loan.

Other suggestions included counseling for clients who had the ability to repay or having clients use a co-borrower. One participant felt that clients should have to make some contribution to the repair costs, otherwise they were not able to afford to continue to live in the house.

D3.3. Aboriginal Targets

a) Is the current target for Aboriginal participation in Homeowner RRAP appropriate (and if not, why)? b) How can the Aboriginal targets for the program be better achieved?

Responses were roughly equally divided between those participants who felt the targets were adequate and those who thought they were not. It is important to note that among those who thought they were not, some felt they should be lowered or eliminated, but others felt they should be raised. Reasons given as to why they were not appropriate included the lack of information as to how the targets were established, the feeling that funds off-reserve should not be targeted based on ethnicity, and the need for an Aboriginal target for rental and rooming house RRAP in recognition of the many renter households among this population. A number felt the targets should be lowered; others felt they should be raised.

With respect to improvements, participants suggested program parameters changes: off-reserve Aboriginal households were among the poorest in Canada facing the highest repair needs and program benefits should be raised to reflect this reality, the program should be made truly affordable for this client group, and eliminate the application of income thresholds.

Other suggestions included working more closely with Aboriginal groups, engaging Aboriginal liaison officers or handing program delivery to Aboriginal agents, and directing more publicity or doing a direct mail to Aboriginal homeowners. One participant felt that off-reserve funds targeted to Aboriginal households and not taken up should be shifted to on-reserve communities.

D3.4 Geographic Targeting

a) Should RRAP be more closely targeted to "pockets" or areas of need or to achieve broader public policy aims? b) If yes, why and how should this be done?

About two-thirds of respondents agreed that there should be targeting to areas of need. One said that revitalization of an entire neighbourhood would address health and safety issues, increase property values and improve the living environment for both children and adults.

Areas suggested were those with high unemployment and poor housing, Aboriginal on-reserve communities, the inner core areas of cities, neighbourhoods in decline, heritage areas, remote areas with higher costs and which are harder to serve, and communities with unique needs, although in the latter case, it was recognized that criteria would need to be developed. A number of respondents felt that geographic targeting should be left to local agents or municipalities to decide, based on community plans. One suggested that the program be blockfunded to municipalities.

On the other hand, a number suggested that more dollars should go into specific areas with greater needs but not to the exclusion of other areas. Finally, an important minority said that the program should target household need, not geographic need, and it was unfair to target to specific areas.

D3.5 Other comments on Homeowner RRAP.

There were a number of comments, which were rather wide-ranging. Comments included continuing with income-testing and the focus on health and safety, basing the program on ability to pay, increasing program funding levels as a first priority, revising income thresholds and not including children's incomes in the calculation, revising the all or nothing approach to repairs, and providing for earlier release of funds to allow work to begin earlier in the year. Other participants suggested that Band and Tribal Councils develop their own housing initiatives, funds be provided to each First Nation community on an as needed basis, tax incentives be developed to encourage homeowners to upgrade their homes, initiatives be developed to assist low-income women, through micro-credit and other mechanisms, access home ownership, safe, affordable student housing be developed in core areas as a means of enhancing the downtown area, and programs be developed to better meet the needs of off-reserve Aboriginal households, since few were homeowners.

D.4. RRAP for Persons with Disabilities

D4.1. Income Testing

What should be the formula for determining income eligibility limits for RRAP for Persons with Disabilities, and why?

The overwhelming majority of participants felt that the calculation of income had to be changed to take into account costs associated with the disability. Most respondents suggested that disability-related expenses should be deducted from income. One proposal along these lines was the use of a set deduction based on the income tax system, although one participant noted that not all persons with disabilities had access to this credit. Another proposal was to take 'net income' as defined by Revenue Canada and from that deduct the disability tax credit. One participant felt that expenses were not deducted then there should be an increase to the income limits of 25 to 30 per cent to compensate for the extra expenses. One participant felt that this issue should be carefully research, with the deduction based on actual experience. One respondent stated that financial assistance received to help with disability related expenses should not be included as earned income in the calculation of income for program purposes.

Another issue raised by a number of participants was the caregiver relationship. It was felt that the income of the caregiver(s) should not be included in the calculation of household income. One respondent noted that if the person with disability could be excluded from the program, if the income of the caregivers was included in the calculation. Along similar lines, one respondent did not want the income of children to be included.

Some respondents felt that there should be no income limit for persons with disabilities. Rather, a 'family budget' approach should be taken, with repayment based on ability to pay. Along these lines, one proposal was that renovation costs should be subsidized to the point that housing costs were not increased beyond 30 per cent of income.

A very few respondents felt that the status quo should be retained with respect to the calculation of income. One thought this necessary to avoid increasing the complexity of the calculation, but suggested that the sliding forgiveness scale be eliminated for persons with disabilities.

It was noted by one participant that many persons with disabilities lived in rental accommodation and hence it was necessary to encourage landlords to participate in the program, so that these clients could be assisted.

Finally, one participant suggested that the program take into account the fact that the needs of persons with disabilities might well change later on and hence the program should allow for more work to be done for the same client over time.

D4.2 Modification Priorities

How could the list of eligible modification items for RRAP for Persons with Disabilities be more effective, while continuing the focus on housing? What would be the rationale for any additions?

Responses broke down basically into three categories.

In the first category—the largest group—were participants who felt that the status quo should be retained, with no changes being made to the list of eligible modifications. This group felt that RRAP is a housing program and the focus should remain on housing. Other programs existed to help with non-housing or medical items and, in recognition, there should be better co-ordination between these programs and RRAP assistance. Here, one participant argued that the program budget wasn't great enough to meet needs currently eligible and hence should not be expanded. One participant felt that the list should be made more specific, as eligible modifications were not well defined. Another thought the guidelines should be made more rigid, to ensure benefits went to the needy.

The second group included participants who agreed that the focus should remain on housing, but felt that the list of modifications should be updated to keep pace with changes in aids such as walkers or wheelchairs (eg, ramps were not wide enough to accommodate new motorized carts), expanded to include adaptations such as more maneuvering space for wheelchairs or walkers, or include any necessary item that was fixed to the structure. Suggestions also included porch lifts where ramps were not feasible or adequate storage space for disability-related equipment.

A third group of responses suggested that the list should be expanded. There were a few participants that felt that the list should include anything that assisted in daily living, or items that allowed a person to stay in their home, such as bathroom aids, scooters and wheelchairs, or that a doctor or occupational therapist might recommend. Another suggested the list include aids not covered by medical assistance programs. There were still others who felt that common sense should be used, or that the focus should be on the individual's needs, rather than the list, and hence assistance should go beyond strict physical needs.

D4.3. New Construction

What would be the rationale for allowing RRAP for Persons with Disabilities to be used for new construction?

A wide range of reasons were given as to why the program could be used for new construction, but the one cited most frequently was cost-effectiveness: it was less costly to build accessibility into a building under construction, than to modify it later, or, as one participant said, why build new and then renovate? Other reasons cited by a number of respondents were that this approach would lessen the need for future renovations and that landlords who might hesitate to incur the costs of renovating an existing project might more readily accept making units under construction accessible, which would lead to an increase in such units. In this regard, RRAP could help subsidize the rent of newly built accessible units. Other reasons cited included: it would enhance the viability of projects that support independent living, because the need was there, there was a lack of accessible housing in the community, it would be less disruptive to homeowners, this approach could be used to build an addition to an existing house to accommodate a person with disability, and new construction might be the only viable solution to assisting some clients.

A few of those who supported the program expansion wanted the program budget to be increased to accommodate the change.

On the other hand, there were many participants who noted that households able to purchase a new home were unlikely to be eligible under RRAP. Another group argued against expanding the program. They felt that the focus should be on existing units and the needy, and, given current limited budgets even existing needs weren't being served.

For other participants, the answer to the issue raised was to change the building code to ensure all new units were made accessible, rather than making RRAP available to effect this change.

D4.4 Stacking on Homeowner RRAP

What is the best way of ensuring that minimum health and safety standards are addressed for clients of RRAP for Persons with Disabilities?

Most responses suggest participants wanted health and safety standards to continue to be met. In this regard, there were a number of participants who stated categorically that health and safety standards should not be compromised and accessibility work should not be done on a house that did not meet standard. Others recognized that this might be an impediment in accessing the program or place too great a financial burden on the client. Hence, a range of suggestions were made to address these issues: adjust the loan based on ability to pay, increase the forgivable portion, or make the loan totally forgivable, adjust the income thresholds, allow deductions from income for extra expenses, such as medical expenses, or make technical adjustments such as longer amortization periods, lower or no interest repayable loans, or deferring repayment with a lien with recapture upon resale. One respondent felt the work could be spread out over a number of years.

Some participants felt that the health and safety standards under the program were excessive and not required or that inspectors were demanding upgrades beyond mere health and safety matters. One participant felt that independent living and not extending the useful life of the building should be the program's objective. Another felt that addressing health and safety issues should be at the sole discretion of the client; if there were serious health and safety matters, then the loan should be 100 per cent forgivable.

D4.5 Other comments RRAP for Persons with Disabilities.

A wide range of comments and suggestions were provided in response to this question. A number were made by more than one participant: the income ceiling was too low and needed to be increased to reflect additional costs incurred by persons with disabilities, or to reflect the statistical poverty levels in Canada; assistance levels should be increased to take into account the true costs of renovations associated with disabilities, and should be indexed to inflation (a number of respondents recommended again that the loan be made fully forgivable); also, a few stated that administratively the program was cumbersome and should be streamlined. Also, a number pointed out the need for greater consultation and co-operation between the program and agencies serving persons with disabilities.

Other participants said that the everyone had the right to decent housing which would have a positive impact on children, the program was essential and its overall purpose should be retained, program budgets should be increased and indexed to inflation, the program should be made permanent and expanded as the demand for the program would grow, in part due to the needs of an aging population, the program was not designed for Aboriginal households and failed given that the households ended up in arrears, remove all program disincentives to independent living, including income limits and house value thresholds, and occupational therapists should be more involved to help prioritize client requirements (another group felt that program decisions should be made by a housing professional and not by occupational therapists).

Other suggestions went beyond current program objectives. One respondent recommended that all CMHC funded housing should have 100 per cent visitability features guaranteed, and the share of accessible units in social housing should be raised from 15 to 100 per cent over time. Another felt that governments should develop new incentives for the creation of more accessible rental accommodation.

D5. Rental and Rooming House RRAP

D5.1. Program Take-up

What are the constraints to program take-up and how could they be eased or eliminated?

A number of responses concerned perceived impediments for landlords: determining tenant incomes was complex (although another participant said that this should be monitored more closely), the determination of rents after renovation—there was a call for greater landlord flexibility to allow for a reasonable return on equity, the 15-year earning period, property liens that made it more difficult to sell the property, and the need to phase the work in over time to ease the financial burden on landlords. One respondent thought that the program was only available when there was a work order against the property, and landlords feared that the program would not cover the costs of the necessary repairs.

In this regard, a couple of respondents suggested that the program be revised to provide an incentive to landlords to fix up single-detached rental units, perhaps targeted to inner city areas. Another felt the program should cover vacancy losses if the unit needed to be vacated for repairs. Other ideas included a lower mill rate for renovated properties and an incentive to relocate suitable units from marginal communities to urban areas.

A number of respondents felt that higher grants were needed; one suggested that higher grant levels were needed to maintain stable rents after renovation. A number of participants called for the program to be expanded to include co-operative and non-profit projects, many without adequate replacement reserves, to sustain the public investment in social housing or to address the problem of premature building envelope failure.

Other comments suggested a need to streamline and simplify the program, change the proposal call process which was out of step with how the industry operated, an easing of the all-or-nothing approach to repairs, and a need for greater partnering with municipalities and housing service managers to better integrate the program with local planning.

On the contrary, one group noted that there were few program constraints, and these were reasonable given the level of assistance provided. Another felt that the new non-profit supply program should be launched to place pressure on private sector landlords to fix up their properties.

D5.2. Homelessness

a) Is Rental and Rooming House RRAP an effective way to provide longer-term housing for people at risk of homelessness? b) How could the program be more effective in addressing priority needs?

Overwhelmingly, participants felt that the program was effective, although a number that said so noted that homelessness was a complex issue and housing alone could not provide all the answers.

With respect to making the program more effective, a number of suggestions were made such as increasing funding levels and benefit levels, increasing program flexibility and promoting it more actively, working more closely with municipalities and other funding initiatives

There were changes suggested to program parameters: lowering the income threshold to target homeless population better, use minimum wage as opposed to median market rents, allow shelters to access the program and in general recognize shelters as part of the housing stock, closer monitoring of who lives in units after renovation, and incorporate this component of the renovation programs into SCPI. One commented that the program was designed for large urban centres rather than for all communities.

Other comments noted the limitations of renovation in addressing homelessness, noting that a home was necessary but also were links with other agencies and partnerships to reduce the cycle of homelessness. Still other respondents felt that what was need was a new supply program. Another felt that public money should go to non-profit or government projects as opposed to the private sector. Another felt the private sector was unlikely to be able to deal with the complex social issues that many people at risk of homelessness had to deal with.

D5.3. Assistance Levels

a) Are Rental and Rooming House RRAP assistance levels sufficient to ensure affordable housing? b) If not, what should they be?

Responses were evenly split between those who thought the levels adequate and those who did not. With respect to the levels, some felt that an adjustment should be made for inflation since the levels had not been changed since 1994; others thought assistance should be based on realistic costs or as a means to encourage rents below median market rents. Others felt that the assistance was not sufficient to reduce the gap between economic and market rent. There was one suggestion that southern zone levels should be increased in line with northern zone ones. Another participant felt that the levels should be raised to allow all rental stock to be repaired. One felt that the level should be $30,000 per unit. There were a few comments to the effect that the landlord should contribute more to renovation costs; one participant felt the landlord's share should be 33 per cent.

D5.4. Other comments on Rental and Rooming House RRAP.

A number of respondents stated that the program was a necessary and highly effective affordable housing program, and an important attempt to improve the existing stock of affordable housing in Canada, and, at least in part, to address homelessness. Another participant felt that the program could be an ideal focal point to distribute information to landlords about multiculturalism and diversity to help ensure RRAP landlords do not discriminate against such groups as immigrants and refugee women.

It was noted that there were many viable applications that could not be produced and hence the program budget needed to be increased. There were a number of comments about landlord participation: one respondent felt there was a concern that support was going more to landlords as opposed to those in need; another said that landlord entitlement should be based on continuing housing households in need, providing affordable rents and maintaining project upkeep; others expressed concern that some landlords used the program as the first step to condo conversion. One participant reiterated the need to make landlords aware of the program. Also, besides renovating the existing stock, there was a need to create new affordable rental accommodation to address the current shortfall.

One participant noted that although the program was not available on reserves, it should be considered since the Band Council is in fact the owner of the houses on reserves. Another respondent called for a task force consisting of CMHC, provinces, FCM and landlord associations to report to the federal government on how the program could be improved.

D6. Conversion RRAP

D6.1. Adequacy of Assistance Level

a) Are the current Conversion RRAP maximum assistance levels sufficient to produce affordable rental units? b) If not, what should the assistance levels be?

Of those who responded to this question, the overwhelming majority felt that the current assistance levels were not sufficient. It was noted that assistance covered only 20-30 per cent of total conversion costs. One participant stated that for developers conversion costs could be higher than for new construction. Another said that conversion costs in downtown heritage areas were much higher than assistance levels. Still another said that for a developer, conversions costs could be higher than new construction costs. One respondent noted that there was a high demand for commercial and light industrial space, and hence conversion to residential required higher assistance levels to induce developers to undertake the conversion.

With respect to a possible level of assistance, a number felt that it should be from $25,000 to $30,000 per unit. Another said that the assistance level should match conversion costs. Another wanted the level to equal that required to create affordable housing, but less than the costs of new construction. One suggestion was that assistance levels should allow resultant project rents to be affordable. Another participant felt that the municipality should provide a ten-year tax holiday and the province should contribute as well. Other comments called for a higher budget for the program and a separate budget line.

This question also raised suggestions for expanding eligible items to include the costs of elevators, which could be shared by property owners if the elevators provided access to two buildings at once, site decommissioning, development approvals, sprinkler systems and other building code exit requirements, common areas, green space or the use of roof tops for amenity areas.

One participant felt that Conversion RRAP was likely the most cost-effective and quickest method to produce additional affordable rental units in urban areas. In contrast, another respondent argued that the focus should be on repairing the existing stock, rather than adding to the stock.

D6.2. Homelessness

a) Is Conversion RRAP a cost-effective way to provide affordable accommodation for homeless people and people at risk of homelessness? b) If not, how could cost-effectiveness and targeting be improved?

Among those who responded, the overwhelming majority felt that the program was a cost-effective way to provide accommodation for homeless people and those at risk of homelessness. A number said that it was an excellent program, a good way to develop new cost-effective housing in the downtown urban area, less expensive than new construction, and a means to help retain existing buildings and revitalize communities. Others felt that it was a useful part of the 'toolkit' to address homelessness, but there was a need for other, complementary programs as well. On the other hand, one participant commented that the program did not address Aboriginal needs, which were for new units for families, not homeless individuals.

Among suggestions for improvement were expansion of the program to include adding units in existing residential buildings, to allow for the conversion of larger homes to multi-family projects or the addition of legal accessory apartments or basement suites, the creation of new, permanent non-profit or government-owned housing, with a deep-subsidy component, higher grant levels and simplification of the delivery process.

D6.3. Availability of Buildings for Conversion

a) What are the constraints to take-up of Conversion RRAP and how could they be reduced or eliminated? b) What other types of buildings should be eligible for conversion?

Participants identified many constraints to program take-up. The one cited most frequently was neighbourhood resistance or NIMBY (not in my backyard). Other constraints identified included the lack of suitable buildings, municipal zoning that impacted on timeliness, and the lack of political will. With respect to municipal zoning, one participant felt there was a need for local government action to legalize secondary suites, the subdivision of existing homes and the creation of more mixed-zoning areas so that commercial properties could be converted and housing brownfield sites identified. A number of program parameters were also identified as take-up constraints: the 5-year vacancy rule, the fact that residential buildings were not eligible, the requirement to stay within the building envelope as often additional development was needed to ensure viability, the inflexible proposal call process, low assistance levels that did not entice developers to participate, the need to expand the parameters to deal with environmental issues, such as asbestos, and a need for more information and advertising about the program,

Similarly, a large range of existing buildings were identified as suitable for conversion: heritage buildings to prevent their demolition, churches, schools, closed hospital wings, convents and stores. One respondent summed it up by suggesting any building suitable for residential living should be included in the program. Another felt that the lack of buildings for conversion was simply a fallacy. Many participants argued for expanding the program to cover residential conversion or the conversion of unoccupied residential; one of these noted that if the program were expanded, existing tenants should not be displaced.

A number of participants suggested the need to work closely with the municipality. Another felt that the program could be used by non-profit groups to obtain long-term head leases from the owners of converted buildings.

D6.4 Other comments on Conversion RRAP

Few additional comments were provided. One respondent felt the program could be a very viable way to increase the housing stock. Another felt that conversion of non-residential buildings would make for more interesting neighbourhoods.

Once again, there was a call for higher forgiveness levels, to $25,000 per unit. One participant suggested that the individual renovation programs should be pooled into a single one, with local allocations based on need. Suggested expansion of program parameters included elevators, sprinkler systems and bringing up to standard vacant residential units that did not meet the municipal minimum space requirements. One respondent felt that the program could help meet the future needs of seniors with respect to assisted living. Another felt that the program would appeal to developers but would not meet the needs of Aboriginals or people living in small urban areas.

E. QUESTIONS ABOUT RRAP ON INDIAN RESERVES

E1. Relevance of RRAP to Reserves

a) Is there a need for a redesigned RRAP on reserves with different program parameters? b) If so, what should be changed and why?

With very few exceptions, participants felt that the program should be redesigned. Usually, those who explicitly stated that the program was working well still wanted some adjustments. Only a few participants did not want any changes made to the current design.

In general, recommended changes were linked to the reality of conditions on reserves. It was noted that reserve communities were facing significant population growth. There was a lack of units and hence there was much doubling up and overcrowding. Many reserves were located in rural and remote areas, and the costs of renovation and repair were much higher on-reserve than elsewhere. In addition, there were higher repair needs on-reserve, in part because much substandard housing had been built. Mold was mentioned very frequently and was perceived to be a major air quality and health issue. Also, unemployment was often high and current program parameters penalized those who were employed. In addition, a number of participants noted that the Band and not individuals or households owned the units on reserves. One respondent argued that the current program design assumed a functioning housing market, assumptions which did not apply to the on-reserve situation.

Proposed changes reflected these comments. A number of participants wanted program eligibility requirements expanded to include items such as mold remediation, air quality, insulation and additional bathrooms where families were doubling up. One participant wanted the parameters changed to meet or exceed building code standards with respect to ventilation and air quality. Others felt that the program should be made more flexible, in particular to address the issue of old, substandard housing; one participant felt that the inspector should, for a given dwelling, determine which items would be eligible for program funding. One participant felt that renovation assistance should be considered as an intergovernmental transfer, with First Nations allowed to decide how best to use the funds.

Suggestions were made for higher overall program budgets, in part to address population growth. There were a number of comments to the effect that mold remediation should be a stand-alone program, with funding in addition to current program levels. Some felt that there should be ongoing repair and replacement funds available for every community and dwelling, with funding targeted to the disadvantaged groups, to ensure that housing did not fall into disrepair.

With respect to loan limits, there were proposals for higher loan limits, limits based on the value of the dwelling, or no limit at all, with the RRAP loan being based on the total costs of the necessary repairs. One participant felt that, like private sector financial institutions, CMHC should be able to offer better lending rates, or that RRAP rates should reflect rates available under CMHC's Direct Lending Program.

With respect to forgiveness levels, there were many who felt that they should be increased so that equity requirements could be lowered, and that forgiveness levels should match the repair costs. It was noted that many Bands were incurring debt to undertake RRAP work and were not able to repay the loans. Some participants called for higher income limits, while others felt that income limits should be eliminated, since Band Councils owned the units.

The question of on-going maintenance was also raised. There was the suggestion that RRAP assistance be tied to mandatory home maintenance courses and another comment to the effect that there was a need for more trades and occupant training on home maintenance. Training material should be translated into the relevant Aboriginal languages.

E2. Level of Program Funding

What should be the appropriate level of annual renovation program funding on Indian Reserves? Why?

With respect to this question, some respondents felt that, at the very least, current funding levels should be maintained, with a five or ten-year commitment of funding. Others felt that the current level was inadequate and did not allow needs be addressed. It was felt that it should reflect the rising costs of materials and labour, the age of the homes and an aging population. Proposed budget increases included 25 per cent more, a doubling of the amount, a doubling of the percentage of

the renovation budgets going to reserves, or increasing the budget tenfold. Other participants felt that the budget should be based on a better assessment of needs on-reserve, with one participant adding a goal of having no dwellings in need of major repairs within five or ten years. Another response stated that the budget should be based on the target of raising the standard of on-reserve housing up to the Canadian standard.

E3. Allocation of Program Funding

What should be the basis for the allocation of CMHC program funding on reserves and why should this method be used?

Various proposals were put forward. Those mentioned most often were based on population—which some felt was the most equitable—and on community or housing needs. Other suggestions included geographic location, given the impact that location and climate had on dwellings, costs of materials, the incidence of overcrowding or of the elderly and disabled within the population, average incomes, and the presence of crisis situations. Some participants felt that each First Nation should receive at least an annual minimum allocation. Many participants proposed an allocation formula based on a number of these factors.

E4. Coordination with DIAND Housing Programs

a) Is RRAP well coordinated with DIAND and other housing programs? b) How could coordination be improved?

Responses were relatively evenly divided with a slight majority suggesting it should be improved. There were a range of suggestions for improved coordination. The one mentioned most often was the need to coordinate budget promulgations. Other ideas included combining CMHC/DIAND housing programs to get a better end product from the outset and allowing for more program flexibility, developing a single per band per capita lump sum funding program for capital enhancement programs, rolling RRAP funds in with the DIAND housing funds, allowing First Nations to decide how funds should be used, better coordination and partnership between DIAND and CMHC, including information sharing, and changing the DIAND requirement that requires $6,000 in band equity for each RRAP loan.

E5. Useful Life/ Emergency Repair Program (ERP)

a) Is an ERP-type program needed as a short-term solution for housing which will fall out of the stock but is required until new housing can be developed? b) If so, how should this work?

About 60 per cent of respondents agreed that an ERP-type program would be helpful on-reserve. There were a number of suggestions as to how this could work. One participant said that the emergency funds should be block funded to the Bands, to address emergencies without a lot of paperwork. Others felt that the program should be structured like the off-reserve one. There was a suggestion that the program include the rental or purchase of prefabricated units for emergency purposes and emergency or temporary relocation costs. One respondent felt that the program could be used to address mold issues. One participant suggested that applications be assessed case-by-case to see if it were worthwhile spending the emergency funds. Another felt that emergency work should extend the useful life of the unit by one or two years.

Those who disagreed did so for various reasons: funds shouldn't be spent on a unit that would eventually be demolished, support should go into improving units and preventing disrepair, and homeowner expectations could be raised without being met later on. Among those who disagreed, a number suggested than any additional funds should go into RRAP.

E6. RRAP for Persons with Disabilities

a) Should there be a separate allocation for RRAP for Persons with Disabilities on reserves? b) If yes, what should the annual budget be and how should the money be allocated? c) What are the alternatives to the all-or-nothing approach to stacking Homeowner RRAP on RRAP-D that would still address health and safety concerns?

A majority of respondents felt that there should be a separate allocation for RRAP for Persons with Disabilities on reserves. One participant noted that the rate of disability among Aboriginal Canadians was double the national average and number of cases of diabetes on reserve was increasing. Another noted that with the current approach, addressing the needs of persons with disabilities reduced the overall number of units that could be repaired.

A fairly large minority opposed separate budgets. One participant felt that First Nations should determine how to allocate the dollars to need. Another opposed separate budgets but still wanted the overall budget increased.

With respect to a budget level, suggestions were made that it should be 50 per cent or 75 per cent or equivalent to the Homeowner RRAP budget. Others felt that the budget for persons with disabilities should be even greater than that for Homeowner RRAP recognizing the high cost of disability-related modifications and repair work. Others felt the budget level should be based on an assessment of need or on population. Participants saw the allocation as being over and above existing levels. One participant thought the budget should be combined with other federal programs such as home and community care.

Suggested criteria for allocation across First Nation communities included demographics, needs assessment, community needs, and health and safety.

Few comments were provided on the all-or-nothing approach under Homeowner RRAP. A few respondents agreed with this approach, as it did not seem to make sense to make a unit accessible if it did not meet health and safety standards. Another said it did not pose a problem as First Nations had access to other sources of funding. Others felt the approach should be dropped, as being too bureaucratic and more needs could be addressed if it were eliminated.

E.7 Need for Conversion RRAP on reserves

a) Are there a sufficient number of suitable non-residential buildings on-reserve to warrant a separate Conversion RRAP allocation? b) Which, if any, program guidelines should be changed for on-Reserve delivery?

A clear majority of respondents felt that there were not any or enough suitable buildings on reserves to warrant a separate Conversion RRAP allocation. One participant felt that it would be a waste of funding; another felt that there was a need for a rental program instead of conversion. One respondent felt that while there were enough buildings to justify the program rent collection would be a problem.

Very few comments were provided on potential program guidelines. A few respondents felt that they should be the same as the off-reserve program. Another said it would be necessary to promote and market the program, and that initially there would be no need for a separate budget allocation.

E.8 Other comments on RRAP on Indian Reserves.

Responses to this question echoed many of the answers to the specific questions above. A number of respondents noted that there was a definite need for RRAP on reserves and the program should continue. One participant argued that the program had to do more to meet the needs of Aboriginal women and children. Another noted the significant lack of housing on reserves, the extent of poverty among the elders and the lack of privacy, control and hope. It was argued that the current budget level should be maintained, but even more wanted the budget to be increased, for one because the budget did not allow a second RRAP request as the priority was to first applications. One participant noted that the year-to-year uncertainty surrounding the budget did not help long-term planning and hence there was a need for a long-term commitment to RRAP funding. There was a call to increase the forgiveness level and link it to cost of living increases as repayments placed a burden on seniors and persons with disabilities.

There were a number of suggestions respecting program delivery: the number of inspections ought to be reduced and brought in line with the regime under HASI, as they were costly and time-consuming; there was a need to streamline the process to allow for the earliest possible release of the funds; as Bands often did not have the necessary funds, the program should allow for accountable advances, as under the non-profit program; the number of contractor bids should be limited to one if there were not sufficient interest; in cases where the Band Council owned the dwelling, the household income should not be factored in, as it was often difficult to obtain the necessary documentation; the list of eligible items should be expanded to include fire-suppression systems. A few participants suggested that there was little incentive for people to take care of their units as there was a feeling that the Band was financially responsible.

F. QUESTIONS ABOUT THE EMERGENCY REPAIR PROGRAM - ERP

F1. Program Relevance

Should ERP continue as a separate program or should it be folded in with RRAP? If so, why?

Opinion was almost evenly divided on this question with slightly more participants arguing that ERP should remain as a separate program as compared to those who said that it should be folded in with RRAP. The main reasons for keeping it separate were that it was an excellent program and very effective in its current form, there was a need for an emergency response to health and safety issues, the 100 per cent grant allowed the very poorest households to do something without the burden of the all-or-nothing approach under RRAP, and it was a relatively simple program to deliver, with little red tape. One participant felt it proved beneficial for persons with disabilities as it was non-repayable. Also, it was felt that ERP made RRAP administration more flexible. Other comments included maintaining ERP's original purpose of bridging to a more permanent housing solution and the need for a bigger program budget. One supporter still felt there was a need to assess if the dwelling was worth repairing.

Among reasons given for folding it in with RRAP, two were cited more frequently: merging would achieve program efficiencies and spending money on dwellings that could not be brought up to standard was wasteful. A number of participants who supported merging the programs suggested that within a joint program ERP could act as a bridge to eventual RRAP work. Two program redesigns were suggested: one that ERP and RRAP be merged to form one program with a single $8,000 grant; the other that RRAP be used for lending purposes and ERP to reduce the interest rate to zero and perhaps provide equity.

Other comments included associating ERP with a program that provided funding for house replacement and expanding ERP to include remediation work for premature building envelope failure.

F2. Issue: Geographic Targeting

a) Should ERP continue to be targeted to northern areas? b) If not, where else should it be available? What would be the rationale for extending the program to these other areas?

About 60 per cent of respondents felt that ERP should remain targeted to northern areas. Reasons given included the harsher northern climates that were harder on housing, the high living costs and costs for material and labour in northern areas, and higher unemployment rates which meant proportionately fewer people could afford repairs. It was also noted that there was a lack of housing in northern areas, which meant that young people, for example, could not own their own houses. One group felt that if there was an urban need, then a separate urban program should be created.

A relatively large minority felt that the program should be expanded. Most felt that it should be made universal, as emergency situations existed everywhere. A few suggested expansion to specific areas, such as poverty stricken areas of cities, small urban centres, or economically depressed areas, including First Nation communities.

F3. Aboriginal Targeting

a) Is the current target for Aboriginal participation in Homeowner ERP appropriate (and if not, why)? b) Can the Aboriginal targets for the program be achieved?

First, it needs to be acknowledged that many participants declined to comment on this question, in part because of a lack of knowledge or awareness of the issue. Of those that did, slightly more felt that the target was not appropriate.

Those who supported the target said that separate recognition of the requirements of off-reserve Aboriginal households was needed as this group often faced housing discrimination. Along the same lines, one participant argued that many government programs were not designed with the needs of this specific group in mind. On the other hand, those who did not feel the target was appropriate thought that people should be treated equally and there was no need for special treatment for given ethnic groups. One group felt that the research establishing the target was not credible.

With respect to achievement, one participant noted that the target in that jurisdiction had been exceeded. Suggestions as to how to improve achievement included higher ERP benefit levels, providing more information to potential clients, assisting clients with the application, developing a housing authority structure and working with provinces responsible for program delivery to ensure off-reserve Aboriginal housing needs were better recognized.

F4. Other Comments on ERP

Relatively few comments were provided. Comments included the need to include plumbing as an eligible item, an increase to the grant levels to cover off such items as septic systems, the retention of ERP as a separate program, with a separate program for urban areas, allowing clients more say in deciding which work to do, and creating a fairer, more transparent client selection process.

G. QUESTIONS ABOUT HOME ADAPTATIONS FOR SENIORS' INDEPENDENCE (HASI)

G1. Relationship to RRAP for Persons with Disabilities

a) Should HASI be merged with RRAP for Persons with Disabilities? b) What is the rationale for continuing HASI as a separate program?

A very strong majority of respondents did not agree with merging HASI with RRAP for Persons with Disabilities.

With respect to those who favoured retaining HASI as a separate program, many participants noted that HASI serves a specific demographic group, with a growing population and increasing needs over time. In this regard, some respondents suggested that seniors did not consider aging as a disability and would not wish to apply for benefits under a program addressing disabilities. A large number emphasized that HASI was a flexible, responsive program that allowed needs and urgent needs to be addressed quickly, and it was relatively easy to partner with other agencies serving seniors. Many seniors only needed minor modifications, at relatively low cost, to be able to age in place, which the program allowed for. HASI was simple and straightforward to administer, and did not impose the lengthy application process or all-or-nothing approach associated with RRAP. It was also available even if the house did not need RRAP or did not qualify for RRAP, and could already be stacked on RRAP, if required. In addition, HASI did serve clients with incomes at or near the income thresholds.

In addition, the question brought forward ideas for improvements to HASI. These included a higher budget, expanding the income thresholds, lowering the age eligibility criterion to include younger households facing similar problems (one participant specifically suggested dropping the age criterion to 60), increase the grant to $5000 and allow clients to apply more often than once every 5 years. Finally, one respondent felt that merging HASI and RRAP would lead to more elderly clients displacing younger clients in need of RRAP for Persons with Disabilities further down the waiting lists and another thought that HASI applications should be inspected to ensure that the house met health and safety standards, and if it did not, then the client should be encouraged to apply for RRAP.

With respect to the minority in favour of merger, the principal reason given was rationalization or streamlining the bureaucracy. Also, a merged program could take better advantage of publicity. Some felt that the work done under the two programs was the same. One felt that limiting HASI to those aged 65 or over was an impediment and hence a reason for merging the programs. On the other hand, merger should not happen at the expense of the client group and the new merged program had to be able to address minor modifications as well as major work.

G2. Assistance Level

a) Should the maximum grant be increased, keeping in mind that HASI is targeted to minor adaptations for support independent living? b) If yes, what should the maximum grant be and how did you derive this number?

Roughly two-thirds of respondents wanted the grant to be increased, the others felt that it was adequate as is. Responses reflected the issue raised by the question of merging HASI with RRAP and also differences of opinion the needs to be addressed by HASI, the cost of responding and what portion governments should assume.

Among those considering it adequate, a number felt that HASI should be merged with RRAP for Persons with Disabilities. Others said that HASI was meant to address costs for minor modifications and if more work was required going beyond the HASI grant level, then the client could apply for RRAP assistance. One respondent who said the level was adequate still felt that the amount should be indexed to changes in costs. Another felt that if RRAP were made more affordable, likely a reference to the current sliding forgiveness scale, then the HASI grant amount was acceptable. Still another felt that home equity should be used for repairs first.

With respect to an increase, there was a range of grant levels suggested, from an increase of 15 to 20 per cent, to $3500, $5000, $7000 or $10,000 per applicant. One respondent said it should be raised at least to the ERP level. It was felt that the average amount of work undertaken was well in excess of $2500 and the grant level should reflect the actual average costs. A few respondents stated that there should be no cut-off and the grant should pay for the costs of the necessary work. Another said that if the grant level were not raised, then clients should be allowed to do the work themselves.

The reason given most often for increasing the grant level was the rising cost of materials and labour, and a higher grant was needed to do the required work properly. It was also noted that costs in the north were higher than in the south and this should be reflected in the grant level. Other reasons advanced included indoor air quality as a growing health issue for seniors and climate change increasing repair needs.

G3. Eligible Adaptations

What items should be added to the list of eligible HASI adaptations and what would be the rationale for these additions in terms of additional housing supports for independent living and increased safety?

Based on responses, no conclusion can be drawn whether a majority of participants felt that the current range of eligible items was adequate, although there were a few statements to this effect. Rather, there was a long list of suggested additions.

Reasons given for adding items usually came down to health and safety or person security. Cited most often were whole house ventilation, central air, air exchanger or air conditioning, given that heat and humidity were a health issue for the elderly, modified, accessible kitchen cabinets, alterations to the bathroom and better guides and security items for stairs, such as fluorescent stair markers and exterior landing step guards. Another group of suggestions were intercom and alarm systems, emergency response call systems and life line emergency phone systems. Other recommendations included braille on the door of cupboards, adaptations to increase the safety of people suffering from Alzheimer's disease, improved door and window locking systems, porch lifts as alternatives to ramps, and wood stove conversion.

There were also a few responses that suggested that a doctor's or occupational therapist's recommendations such be given more weight in the approval process.

Other Comments on HASI

First, there were a number of comments expressing strong support for the program and that it continue. Others stated that it was an excellent program that met needs, both landlords and homeowners could apply under the program and that it was an invaluable assist in helping meet a client's equity requirements under RRAP. Of special note in this regard, there were a number of responses that strongly underscored the importance of HASI in preventing falls in the home, as for senior citizens, a fall could end one's independence or be life threatening. It was strongly argued that HASI was cost-beneficial: one hip fracture cost $25,000; falls to the home were costing one province some $180 million annually; and, 40 per cent of nursing home admissions, where costs were far higher than living in one's own home, were due to falls. Another participant noted the importance of HASI to help maintain independence for women, who made up a larger part of the elderly population.

In response to this question were suggestions for improvement that largely reflected those stated earlier: the grant level was not high enough to cover needed repairs, income limits should be raised as many seniors had incomes just above the thresholds, and the age eligibility criterion should be lowered to 60. Other statements included the suggestion that clients should agree to live in their homes for a certain period after the work was completed and that more, but less confusing, information and more publicity were required. Concerns were expressed that the approval process was too lengthy, that HASI could do little to help older buildings and that due to a perceived lack of program monitoring, some contractors were using the program to take advantage of seniors.

H. QUESTIONS ABOUT THE SHELTER ENHANCEMENT PROGRAM (SEP)

H1. Homelessness Component

a) Has this proven to be an effective way to provide housing for homeless youth?
b) How could the program be improved?

a) Of the participants who responded to this question, the great majority felt that it was effective in providing housing for homeless youth. One participant noted that if youth have a safe shelter then they are not on the street. However, a number mentioned that they were unaware of the program or it had not been delivered in their area.

b) A fair number of suggestions for improvement were put forward. A few were mentioned more than once: the allocated budget was not great enough to meet demand and more shelters were needed; youth shelters should be funded out of a separate budget; and, the program needed to be expanded to deal with a broader range of issues, not just family violence, and a broader range of clients, such as seniors who could also be victims of family violence and were in need of a safe shelter. Along these lines, one participant suggested it was very difficult to differentiate between homeless youth who were victims of family violence and those who were not. Another suggested that some of the definitions of homelessness were artificial and did not reflect reality. One participant stated that the program was not focused on homeless youth. Another advocated the establishment of women-only shelters for youth since younger women were particularly vulnerable to sexual abuse and such a measure would help reduce the sexual exploitation of young women. It was also suggested that the program needed to be more widely publicized and that youth ought to be made aware of programs available to them. There were also a few suggestions to expand the program to include drop-in shelters with counseling, or a mentoring component, and incorporate life skills training so that youth are not so dependent on social services. Finally, it was suggested that funds be allocated to agents directly, as opposed to proceeding via a proposal call.

H2. Coordination of Services

How could SEP funding be better coordinated with funding from other sources for the ongoing operation of the housing?

A number of suggestions were made in response to this question. A number of participants argued that there should be greater coordination among funding agencies to maximize program benefits. It was recognized that capital was generally easier to access than operating funds. In this respect, it was suggested that qualifying for SEP should allow a group to also qualify automatically for the other necessary resources, or that a SEP funding commitment would make it easier for a group to access other partners. One participant felt that operating agencies should provide multi-year funding commitments. Another remarked that operating funding could not be relied upon as readily as in the past and hence SEP applicants needed to demonstrate that they had access to such funds, now and in the future. It was suggested that stakeholders needed to network and partner. One participant felt that separate program funding should be established to ensure shelter operation. Another participant suggested that there be a community consultative process on available SEP funding. One participant noted that in their municipality a coordinating committee had been established, bringing together governments, foundations and quasi-government funders together to review and coordinate funding. Another suggested that municipal agents were ideally placed to coordinate SEP with community groups providing support services. Another felt that responsibility for coordinating funding for family violence shelters and housing within one agency could be assumed by municipalities or government or NGOs.

Some other comments touched on other matters. One suggestion was to allow groups more control over the renovation work to ensure that it was done properly, which would provide a more efficient management of available funds. Another proposed that some SEP funds be used for maintenance and repair work arising from damage suffered at times by shelters. Finally, one participant felt that there was a significant lack of housing solutions for women and children fleeing domestic violence, both with respect to second stage housing and also permanent housing in safe areas.

H3. Other Comments on SEP

A number of participants used this question to underscore the importance of SEP to addressing the need for shelters for women and children and youth fleeing family violence. One noted that SEP was critical to maintaining and improving facilities and was an important funding source for shelters and second stage housing. For some, it was critical that funding be maintained at least at current levels, although funding increases were preferred. Others stated categorically that there was a huge void to fill in shelter financing and more funds were needed. Also, there should be a long-term focus on the program. This need was also reflected in the comment that many women were turned away daily from second stage housing, as the project was full.

A number of participants stated that SEP was a good program, but improvements were required. Among those noted were the decentralization of program delivery and administration to local communities (e.g., municipalities, social service agencies, First Nation communities), given they had a better understanding of local conditions; it should be possible to place shelters elsewhere than in areas in decline; applications should be prioritized by shelter condition and extent of repair needed rather than be dealt with piecemeal; there was a need for better coordination between government departments delivery SEP and social services to ensure combined access to capital and operating funds. Others felt that there was a need to expand the eligible client group to include all vulnerable people, including the elderly, persons with disabilities, or adult men suffering from abuse.

Other comments focused on the need to better inform shelter organizations of available funding, the fact that repairs did not always meet clients' needs, and a CMHC review of the capital requirements for maintaining shelters.

There were also comments related to the on-reserve situation. It was felt that program information should make it more explicit that funding was available for reserves; youth shelters and women's safe houses for high risk behaviour were a priority; and, an on-reserve detoxification shelter would enhance access to the program for people in need.